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BELLSOUTH TELECOMMUNICATIONS, INC.
SUPPLEMENTAL REBUTTAL TESTIMONY OF
PAT RAND

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 010740-TP
SEPTEMBER 17, 2001

Q. PLEASE STATE YOUR FULL NAME, YOUR BUSINESS ADDRESSES,
AND YOUR POSITION WITH BELLSOUTH.

A. My name is Pat Rand. I am employed by BellSouth as a Manager in
Interconnection Sales. My Address is 600 N. 19th Street, Birmingham,
Alabama 35203.

Q. DID YOU PREVIOUSLY FILE TESTIMONY IN THIS PROCEEDING?

A. Yes. On August 27, 2001, I filed panel rebuttal testimony with BellSouth
witnesses Jerry Wilson, Pattie Knight, and Jimmy Patrick.

Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL REBUTTAL
TESTIMONY?

A. The purpose of my supplemental rebuttal testimony is to address a
document included in IDS' Second Supplemental Response to
BellSouth's Interrogatory No. 73, which asked IDS to identify and describe

1 any documents that support Mr. Kramer's contention, on page 16 of his
2 direct testimony, that "[t]he very next week after the first problems had
3 been solved, IDS attempted to start converting our existing customer base
4 to UNE-P and we discovered that BellSouth had placed a local PIC
5 'freeze' on our resale customers – essentially blocking our ability to
6 convert these customers to UNE-P."¹ Specifically, I will address an e-mail
7 from myself to Landra Martin that was included in this second
8 supplemental response.

9
10 Q. WHAT WAS THE SITUATION SURROUNDING THIS E-MAIL?

11
12 A. At IDS' request, BellSouth had placed a Local Service Freeze on certain
13 of IDS' resale accounts. When IDS attempted to convert these accounts
14 from resale to UNE-P, the existence of the Local Service Freeze on these
15 accounts prevented the conversion orders from being processed. As
16 discussed by BellSouth witness Michael Lepkowski in his rebuttal
17 testimony, BellSouth investigated this situation in an effort to assist IDS,
18 and in the end we were able to address the situation very quickly. My e-
19 mail to Ms. Martin was part of the process of investigating this situation.

20
21 Although the copy of the e-mail that IDS produced in discovery does not
22 have a date or time on it, I have attached as Exhibit PR-1 a copy of the e-
23 mail that shows that I sent it to Ms. Martin on April 25, 2000 at 9:22 p.m. I

¹ On page 34 of his replacement rebuttal testimony, Mr. Kramer clarifies that the "[r]eference in my direct testimony to a Local PIC Freeze should have been to a Local Service Freeze."

1 was working late that night, and I was explaining that IDS was having
2 problems processing resale to UNE-P conversions for accounts upon
3 which IDS had previously asked BellSouth to place a Local Service
4 Freeze.

5

6 Q. PLEASE ADDRESS THE LAST LINE OF YOUR E-MAIL.

7

8 A. The last line of my e-mail reads "Guess we showed them how we could
9 really freeze the account. HA!" At the end of a long day, I was simply
10 noting that it was ironic that a Local Service Freeze worked so well that it
11 even prevented a change from a resale to a UNE-P account being
12 provided by the same ALEC. This was, of course, before I learned of the
13 reason this happens (which is explained in the supplemental rebuttal
14 testimony of BellSouth witness Janet Miller Fields). The last line of my e-
15 mail is not intended to be a joke, and as evidenced from how late I was
16 working to try to address the situation, it does not reflect any unwillingness
17 on my part (or on the part of BellSouth in general) to help IDS.

18

19 Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL REBUTTAL
20 TESTIMONY?

21

22 A. Yes.

23

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Hobbs, Linda

From: Brooks, Lisa
Sent: Monday, September 17, 2001 10:49 AM
To: Meza, James; Patrick, Jimmy; Lackey, Douglas; Turner, Patrick
Cc: Hobbs, Linda
Subject: Tate's Supplemental Rebuttal Draft

Importance: High



*tate supplemental
rebuttal doc...*

Linda Hobbs,

Please make sure that Linda Tate gets a copy of the attached to review as soon as possible. I understand that she is in witness training. Ask her to especially review the last Q and A about EDI-PC being used for loop-port conversions. We had this in Jimmy Patrick's testimony, but he said he doesn't have first-hand knowledge of this - he said Linda Tate is the one that said ALECs could continue to use EDI-PC for loop-port conversions. Make sure she agrees.

Lisa

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 010740-TP
Exhibit PR-1